Job Applicant Privacy Notice

V1 - August 2026

1. Who we are and what we do

Who we are

We are Global Loan Agency Services Limited ("GLAS", "us", "we", "our"). We are a limited company registered in England and Wales under registration number 08318601 and we have our registered office at 10, Old Bailey, 2nd Floor, London, United Kingdom, EC4M 7NG. We are registered with the UK supervisory authority, Information Commission ("IC") in relation to our processing of Personal Data under registration reference ZA228204.

What we do

GLAS is an independent provider of loan agency, debt administration and trustee services. It works with lenders, borrowers and investors, helping to manage loans, bonds and other financing arrangements. GLAS also supports organisations with transaction administration and financial restructuring services. We and our affiliates, subsidiaries and related entities are committed to protecting the privacy and security of the Personal Data we process about you.

Controller

Unless we notify you otherwise, we are the controller of the Personal Data we process about you. This means that we decide what Personal Data to collect and how to process it.

2. Who this privacy notice applies to

This privacy notice applies to you if you apply for a job with us, whether as an employee, volunteer or a consultant.

3. Purpose of this privacy notice

The purpose of this privacy notice is to explain what Personal Data we collect about you when you apply for a job with us and how we process it during the recruitment process. This privacy notice also explains your rights, so please read it carefully. If you have any questions or you wish to make a complaint, you can contact us using the information provided below under the section called "How to contact us and our Data Protection Officer".

4. What Personal Data is

'Personal Data' means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

'Special Category Personal Data' is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone's sex life or sexual orientation. !

5. Personal Data we process

When you apply for a position with us (whether as an employee, volunteer or consultant) or submit your CV (or similar employment information) to us, whether directly or through an agency, or attend an interview in person

or by remote means, we will process your Personal Data. For further details on the type of data we may process and how we use it, see the table below in the section entitled 'Purposes and lawful bases'.

References

Please note, when we receive references, we do so on a confidential basis. As a result, we would never provide you with a copy of your reference from a referee.

Equality Act 2010

We may also collect special category Personal Data but we will only do this, where necessary, to meet our legal obligations under the Equality Act 2010 when recruiting. For example, to make reasonable adjustments for you, if you are disabled. How we collect your Personal Data

We collect most of the Personal Data directly from you in person, by telephone, text or email.

However, we may also collect your Personal Data from third parties, such as referees and recruitment agencies.

6. Purposes and lawful bases for using your Personal Data

We may collect and use the following types of personal data about you for the purposes explained below.

Purpose	**Categories of Personal Data**	**Lawful Basis for Processing**
To assess your suitability for the role	Name and contact details (address, mobile phone number and email address) Date of birth and gender (if applicable to the role) Work history and employment positions held Salary, other compensation, and benefits information Nationality / visa / work permit information (where applicable) Academic and professional qualifications, education, and skills	Processing is necessary for taking steps to enter into a contract with you or for the performance of our contract with you (Article 6(1)(a) of the UK GDPR).

To assess your suitability for the role	Photographs you may submit with your application Your location Records we create during interviews or correspondence with you Results of pre-employment screening checks such as references or DBS checks (where applicable) Any other information you choose to give us or we collect from a third party	Processing is necessary for taking steps to enter into a contract with you or for the performance of our contract with you (Article 6(1)(a) of the UK GDPR).
To make reasonable adjustments for you during the interview process and comply with our legal obligations under the Equality Act 2010.	Special category Personal Data	Processing is necessary for us to comply with our legal obligations (Article 6(1) (c) of the UK GDPR) For special category data, the additional basis that we rely on relates to our obligations in the field of employment and the safeguarding of your fundamental rights (Article 9(2) (b) of the UK GDPR and Schedule 1 part 1(1) of the DPA 2018)
To conduct pre-employment screening checks including checking your identity and your right to work in the UK	Name and contact details (address, mobile phone number and email address) Identity data Date of birth and gender Nationality / visa / work permit information (where applicable) Contact details of referees	Processing is necessary for us to comply with our legal obligations (Article 6(1) (c) of the UK GDPR For special category data, the additional basis that we rely on relates to our obligations in the field of employment and the safeguarding of your fundamental rights (Article 9(2) (b) of the UK GDPR and Schedule 1 part 1(1) of the DPA 2018)

To contact unsuccessful applicants about future suitable vacancies	Name and contact details (address, mobile phone number and email address)	Processing is necessary for our legitimate interest of searching for suitable candidates for future vacancies based on their skills set out in the records we hold on candidates (Article 6(1) (f) of the UK GDPR) **OR** We will carry out this processing where you have consented to us retaining your data and contacting you about future vacancies based on the skills set out in the records we hold about you (Article 6(1)(a) of the UK GDPR)
Applicant tracking system	Information that you provide when you apply for a role. This includes information provided through an online application, via email, in person at interviews and/or by any other method. In particular, we process personal details such as name, email address, address, date of birth, qualifications, experience and any information relating to your employment history, skills and experience that you provide to us. If you contact us, we may keep a record of that correspondence. Details of your visits to our careers website including, but not limited to, traffic data, location data and other communication data, the site that referred you to our careers	Processing is necessary for us to comply with our legal obligations (Article 6(1) (c) of the UK GDPR) For special category data, the additional basis that we rely on relates to our obligations in the field of employment and the safeguarding of your fundamental rights (Article 9(2) (b) of the UK GDPR and Schedule 1 part 1(1) of the DPA 2018)

	website and the resources that you access. We may also review social media posts related to you.	
To ensure the safety and security of people and property	Images recorded using CCTV	Legitimate interests – the processing is necessary for the purposes of our legitimate interests in keeping people and our property safe
For the purposes of the prevention, detection or investigation of crime or for the apprehension or prosecution of offenders	Images recorded using CCTV	The processing is necessary for the purposes of recognised legitimate interests.

CCTV

We will keep CCTV images for 30 days, unless an incident occurs, in which case we will retain it until the conclusion of any associated investigation and action.

7. Processing special category Personal Data

We will only process the more sensitive Personal Data, known as 'special category' Personal Data where we meet one of the conditions required by law for doing so. This includes complying with legal obligations or exercising specific rights in the field of employment law. In some cases, we may ask for your explicit consent to process this type or Personal Data.

We process special categories of Personal Data when we collect or process information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work and to provide appropriate workplace adjustments.

8. Sharing your Personal Data

We may share your Personal Data with service providers and suppliers to our business who process Personal Data on our behalf. In such cases, our service providers and suppliers are data processors and may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the contract between us and the service providers and suppliers.

We use Pinpoint as our Applicant Tracking Service (ATS) and share personal data with them for the purpose of assessing candidates. Pinpoint is a service provided by The Infuse Group Ltd, and only processes personal data in accord with GLAS's instructions. Within our organisation, your Personal Data will only be shared with those who need to have access to it, which will primarily be our HR personnel and hiring managers.

9. International Transfers

Your Personal Data may be processed outside of the UK. This is because the organisations we use to provide our service to you are based outside the UK.

We have taken appropriate steps to ensure that when your Personal Data is processed in a country outside the UK, it does not have a materially lower level of protection than that guaranteed in the UK. We do this by ensuring that:

- Your Personal Data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation) or
- We enter into an International Data Transfer Agreement ("IDTA") with the receiving organisation and adopt supplementary measures, where necessary. (A copy of the IDTA can be found here https://ico.org.uk/media2/migrated/4019538/international-data-transfer-agreement.pdf; or
- When transferring your Personal Data to America, we rely on the UK-US Data Bridge, where appropriate.

10. How long will we retain your information?

We will retain your Personal Data for only as long as is necessary for the recruitment process. If your candidacy is successful and you are employed or hired by us, your Personal Data will be processed and retained as set out in our employee privacy notice, provided to you with your employment paperwork.

If your candidacy is not successful, we will retain your CV, application details and interview notes for[JC1.1] 12 months (from the date we notified you we would not move forward with your application) in order to inform you about any future vacancies we have that may be of interest to you. Please let us know if you would like us to delete your records before our retention period lapses and we will do so.

We will also retain Personal Data where it is necessary to comply with our legal obligations or as necessary in relation to legal claims. This is rare but may mean we need to retain your Personal Data for longer than 12 months.

11. Automated Decision-making

We do not make any decisions about you based solely on automated decisions.

12. Your rights

You have certain rights in relation to the processing of your Personal Data, including to:

- **Right to be informed:** You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access (commonly known as a "Subject Access Request"):** You have the right to receive a copy of the Personal Data we hold about you.
- **Right to rectification:** You have the right to have any incomplete or inaccurate information we hold about you corrected.

- **Right to erasure (commonly known as the right to be forgotten):** You have the right to ask us to delete your Personal Data.
- **Right to object to processing:** You have the right to object to us processing your Personal Data. If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.
- **Right to restrict processing:** You have the right to restrict our use of your Personal Data. This means you can ask us to suspend the processing of your Personal Data, in certain circumstances, such as where you contest the accuracy of the Personal Data.
- **Right to portability:** You have the right to ask us to transfer your Personal Data to another party.
- **Automated decision-making:** You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.
- **Right to withdraw consent:** If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.

How to exercise your rights

You will not usually need to pay a fee to exercise any of the above rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

13. Complaints

You have the right to complain if you consider that we have not complied with the data protection law when handling your Personal Data. We will acknowledge receipt of your complaint within 30 days, investigate the matter without undue delay, and keep you informed of the progress and outcome. If you wish to complain please use the contact details given below under "How to contact us and our Data Protection Officer". We will do our best to resolve the matter to your satisfaction.

If you are not satisfied with the outcome of your complaint, you can complain with the relevant supervisory authority. The supervisory authority in the UK is the Information Commission who can be contacted online at:

Contact us | ICO

Or by telephone on 0303 123 1113

For supervisory authorities in other countries within the EU see the link below:

https://edpb.europa.eu/about-edpb/about-edpb/members_en

14. How to contact us and our Data Protection Officer

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact us as follows:

2nd Floor, 10 Old Bailey, London EC4M 7NG

dpo@glas.agency

We have also appointed a Data protection Officer ("DPO"). Our DPO is Evalian Limited and can be contacted as follows:

Evalian Limited,
West Lodge,
Leylands Farm,
1 Nobs Crook,
Colden Common,
Winchester,
Hampshire,
SO21 1TH.

dpo@evalian.co.uk

Please mark your communications FAO the 'Data Protection Officer'.

15. Changes to this privacy notice

We may update this privacy notice from time to time in response to changes in applicable laws and regulations and our processing practices. When changes are made, we will update the effective date at the top of this document.

Previous versions of this notice are available on request.